

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

JAMES E. BACHMAN, ADELLA A. BACHMAN, ERIC J. BACHMAN, RACHEL A. BACHMAN, MATTHEW R. BACHMAN, and C. Andrew Bachman,)	CASE NO. 8:19-CV-00276
)	
)	MOTION FOR PROTECTIVE ORDER
)	
Plaintiffs,)	
)	
v.)	
)	
LEAF SUPREME PRODUCTS, LLC AND JOHN Q. BACHMAN,)	
)	
Defendants.)	

Comes now, Defendants and for their Motion for Protective Order pursuant to FRCP 26(b)(2)(c) submit the Declaration of Raymond R. Aranza and their supporting brief. Defendants request an order limiting the Requests for Admissions served by Plaintiffs in this matter and the Interrogatories served by Plaintiffs in this matter. Defendants request such other and further relief as the Court deems equitable.

LEAF SUPREME PRODUCTS, LLC,
and JOHN Q. BACHMAN, Defendants,

BY: /s/Raymond R. Aranza
Raymond R. Aranza #18523
Valentine O'Toole, LLP
11240 Davenport Street
Omaha, Nebraska 68154
Phone: 402-330-6300
Fax: 402-330-6303
E-Mail: raranza@womglaw.com
ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of September, 2020, I electronically filed the foregoing Notice with the Clerk of the United States District Court using the CM/ECF system, which sent notification of such filing to the following:

James E. Bachman
jebachman@msn.com

/s/Raymond R. Aranza
Raymond R. Aranza, #18523